

EXHIBIT 2

From: [Edlin, Elise \(SFO\)](#)
To: [Ryan Caughey](#)
Cc: [Nolan, Doug \(PAO\)](#); [Amber Magee](#); [Bryce T. Barcelo](#); [Max Tribble](#); [Vanessa Keller](#); [Kalpana Srinivasan](#); [Stacy Schulze](#); [*Cisco-Paltalk-Service](#)
Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics
Date: Thursday, September 15, 2022 1:57:05 PM

Ryan,

Following our discussion yesterday about Paltalk's requested extension, I've included a proposal for the modified schedule. This is based on a 3 week extension of fact discovery.

Please let us know your position by noon tomorrow on this and on the proposed stay, so that we can plan accordingly.

Explanation	CURRENT	PROPOSAL
Close of fact discovery.	09/22/2022	10/13/2022
L/D for opening expert reports.	09/29/2022	10/20/2022
L/D to file discovery motion pertaining to conduct occurring during the final 7 days of discovery.	10/06/2022	10/20/2022
L/D for rebuttal expert reports.	10/27/2022	11/17/2022
Close of expert discovery. ***Important: This date must be computed from the originally scheduled Markman hearing.	11/17/2022	12/12/2022
Deadline for second of two meet and confers to discuss narrowing number of claims asserted and prior art references at issue to triable limits.	11/23/2022	12/14/2022
Daubert, dispositive motion, and joint report deadline.	12/01/2022	1/16/2022
L/D to serve pretrial disclosures, including jury instructions, exhibits lists, witness lists, discovery and deposition designations.	12/15/2022	TBD
Parties jointly email the Court's law clerk to confirm pretrial and trial dates.	12/20/2022	TBD
L/D for parties to jointly email Court's law clerk to confirm pretrial conference and trial dates.	12/29/2022	TBD
L/D to serve objections to pretrial disclosures / rebuttal disclosures.	12/29/2022	TBD

L/D to file motions in limine.	01/05/2023	TBD
L/D to serve objections to rebuttal disclosures.	01/05/2023	TBD
L/D to file joint pretrial order and pretrial submissions, including jury instructions, exhibits lists, witness lists, discovery and deposition designations. ***Note: L.R. CV-16(f) may set different deadline. ***Important: This date must be computed from the originally scheduled Markman hearing.	01/12/2023	TBD
L/D to file oppositions to motions in limine. ***Important: This date must be computed from the originally scheduled Markman hearing.	01/12/2023	TBD
Deadline to meet and confer regarding remaining objections and disputes on motions in limine. ***Important: This date must be computed from the originally scheduled Markman hearing.	01/19/2023	TBD
L/D to file and serve list of stipulated facts, exhibit list, witness list including designation of testimony and any transcripts, motions in limine and estimate of probable length of trial (or 14 days before trial, jury selection or docket call, whichever is first).	01/19/2023	TBD
L/D to file notice of request for daily transcript or real time reporting for trial and to email court reporter.	01/19/2023	TBD
L/D to file and serve proposed jury questions, statement of claims or defenses and proposed jury instructions and verdict forms (or 14 days before trial, jury selection or docket call, whichever is first).	01/19/2023	TBD
Re action involving validity or infringement of a patent: L/D for party asserting invalidity or noninfringement to give notice to adverse party of information set forth in 35 USC 282.	01/24/2023	TBD
L/D to file and serve list of objections to use of deposition testimony designated by other party, list of objections to admissibility of any exhibits and responses to motions in limine (or 7 days prior to trial, jury selection		

or docket call, whichever is first).	01/26/2023	TBD
L/D to file joint notice identifying remaining objections to pretrial disclosures and disputes on motions in limine. (Amended Scheduling Order - [42])	01/30/2023	TBD
Date of final pretrial conference. (Amended Scheduling Order - [42])	02/02/2023	TBD
L/D before trial for party defending against a claim to serve (by mail/other means) an offer of judgment on opposing party.	02/06/2023	TBD
L/D before trial for party defending against a claim to serve (by electronic means) an offer of judgment on opposing party.	02/09/2023	TBD
L/D to file and serve list of stipulated facts, exhibit list, witness list including designation of testimony and any transcripts, motions in limine and estimate of probable length of trial (or 14 days before final pretrial conference, if earlier).	02/09/2023	TBD
Re jury trial: L/D to file and serve proposed jury questions, statement of claims or defenses and proposed jury instructions and verdict forms (or 14 days before final pretrial conference, if earlier).	02/09/2023	TBD
L/D to file and serve list of objections to use of deposition testimony designated by other party, list of objections to admissibility of any exhibits and responses to motions in limine (or 7 days prior to the final pretrial conference, whichever is first).	02/16/2023	TBD
Reminder: Any party that intends to present evidence at trial that requires the use of technology is required to communicate this intention to court staff in advance of commencement of trial.	02/17/2023	TBD
Date of trial commencement.	02/23/2023	TBD

Elise Edlin | Perkins Coie LLP

COUNSEL

She/her/hers

505 Howard Street Suite 1000
San Francisco, CA 94105
D. +1.415.344.7191
F. +1.415.344.7391
E. EEEdlin@perkinscoie.com

Visit our COVID-19 page: www.perkinscoie.com/coronavirus

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From: Ryan Caughey <rcaughey@susmangodfrey.com>
Sent: Tuesday, September 13, 2022 2:14 PM
To: Edlin, Elise (SFO) <EEEdlin@perkinscoie.com>
Cc: Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>; *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Elise – I write in response to the issues raised in your email, as well as some broader schedule issues. I could chat about these issues at various times over the rest of this week.

- Mr. Katz's Deposition: While we would have preferred to start earlier, we can work with your proposed start times for Mr. Katz.
- Mr. Barave's Deposition: We are going to have to reschedule Mr. Barave's deposition. I know I initially said we could take his deposition on Friday 9/16, but upon further inquiry the scope of the testimony and topics, Cisco's recent productions of documents, Mr. Katz's deposition this week, the multiple depositions scheduled next week, and the relevance of Cisco presentations (per your email below) makes it not feasible to reasonably prepare for and take Mr. Barave's deposition on Friday. Mr. Barave was not identified on your disclosures, and the first we heard of his deposition was on Thursday evening of last week. You did not identify topics for Mr. Barave's deposition until a few days ago on Saturday, when you told us he would cover 14 topics. You also asked for identification of presentations by EOB tomorrow. I had hoped, given the impending discovery deadline, that notwithstanding these issues it would be feasible to proceed on Friday, but it is not. Please tell us other dates when Mr. Barave is available.
- Mr. Belcher's Deposition: We have had a couple conflicts arise with respect to Mr. Belcher's deposition scheduled for 9/21, including an evidentiary hearing in another case. Given that, and given that there are already three other depositions scheduled for next week, we ask you to tell us other dates when Mr. Belcher is available.
- Two-Week Extension to Discovery Deadlines: As you know, the next two weeks are jammed with depositions, including multiple days for Mr. Katz this week. There are already 3 depositions scheduled for after the close of discovery, and various outstanding issues, including with your retention of experts as consultants. This is causing scheduling, staffing, and expert challenges (due to depositions butting up against expert reports). To relieve pressure and make it possible to complete discovery within the Court's deadlines, and to allow for expert work to be completed, we propose a two-week extension to the fact discovery deadline and two week extensions to the expert report deadlines. Those extensions

could be agreed without any effect on other deadlines; i.e., we do not think dispositive motion or other deadlines would need to be affected, and it would better comport with the realities of the case and allow for Mr. Barave's deposition to be completed. Please let us know if you agree.

Best,
Ryan

Ryan Caughey | Susman Godfrey LLP

713.653.7823 | c. 202.714.2302

1000 Louisiana St. | Suite 5100 | Houston, Texas 77002
HOUSTON • NEW YORK • LOS ANGELES • SEATTLE

rcaughey@susmangodfrey.com | [Ryan Caughey Bio](#)

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From: Edlin, Elise (SFO) <EDlin@perkinscoie.com>

Sent: Tuesday, September 13, 2022 1:39 PM

To: Ryan Caughey <rcaughey@susmangodfrey.com>

Cc: Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>; *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

EXTERNAL Email

Ryan,

Unfortunately we are not able to move the start time for Mr. Katz's deposition tomorrow, and will begin at 9 am PDT. However, we are able to move the start time on Thursday to 8 am PDT.

For Friday, Mr. Barave will be testifying about the following topics. If for any reason this changes, I will let you know as soon as possible.

Topics: 19, 28, 42, 43, 44, 45, 46, 47, 48, 51, 52, 54, 61

For topic 47, you agreed to provide notice of any specific presentations that you would like him to be prepared to discuss. Please let us know by EOB tomorrow, so that we can identify the documents and ensure that he is prepared.

Thank you,

Elise Edlin | Perkins Coie LLP

COUNSEL

She/her/hers

505 Howard Street Suite 1000
San Francisco, CA 94105
D. +1.415.344.7191
F. +1.415.344.7391
E. EEdlin@perkinscoie.com

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From: Ryan Caughey <rcaughey@susmangodfrey.com>
Sent: Saturday, September 10, 2022 5:18 PM
To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>
Cc: Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>; *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: Re: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Yes. We could M&C Monday morning pacific time. How about 11:30am PT?

We will take Barave on 9/16

Ryan Caughey
Susman Godfrey LLP
Office: (713) 653-7823
Mobile: (202) 714-2302

On Sep 10, 2022, at 2:46 PM, Edlin, Elise (SFO) <EEdlin@perkinscoie.com> wrote:

EXTERNAL Email

Ryan,

Please let us know if you are available to meet and confer on Monday about Paltalk's objections to Cisco's 30(b)(6) topics.

The following is a list of topics that we plan for Mr. Barave to address for Cisco. We reserve the right to modify this list, but wanted to give you a sense of the scope for planning purposes.

Please confirm as soon as possible whether you will take his deposition on Friday the 16th.

Topics: 19, 28, 41, 42, 43, 44, 45, 46, 47, 48, 51, 52, 54, 61.

Thank you,

Elise Edlin | Perkins Coie LLP

COUNSEL

She/her/hers

505 Howard Street Suite 1000
San Francisco, CA 94105
D. +1.415.344.7191
F. +1.415.344.7391
E. EEdlin@perkinscoie.com

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From: Ryan Caughey <rcaughey@susmangodfrey.com>

Sent: Friday, September 9, 2022 6:55 AM

To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>

Cc: Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <k.srinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>; *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: Re: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

I'm trying to see if we can cover it. It's posing scheduling challenges given Mr Katz's depo and the fact that you haven't told us the topics yet—but I'm checking. I'll get back to you asap

Ryan Caughey
Susman Godfrey LLP
Office: (713) 653-7823
Mobile: (202) 714-2302

On Sep 8, 2022, at 6:06 PM, Edlin, Elise (SFO) <EEdlin@perkinscoie.com> wrote:

EXTERNAL Email

Hi Ryan,

As I mentioned on our call last week, Cisco will produce one additional 30(b)(6) witness for a subset of the Paltalk's topics. Amit Barave (VP Product Management) is available for deposition on September 16th. I will send you a list of topics that Mr. Barave will cover as soon as possible, but our intention is to have him testify about topics related to the value, usage, marketing, and strategy for the accused products.

Thank you,

Elise Edlin | Perkins Coie LLP

COUNSEL

She/her/hers

505 Howard Street Suite 1000
San Francisco, CA 94105

D. +1.415.344.7191

F. +1.415.344.7391

E. EEdlin@perkinscoie.com

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From: Edlin, Elise (SFO)

Sent: Wednesday, September 7, 2022 4:32 PM

To: Ryan Caughey <rcaughey@susmangodfrey.com>; Nolan, Doug (PAO) <DNLan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <kksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Hi Ryan,

I checked with Mr. Boyles, and he is not available on the 26th or 27th. We will have to move forward as planned on the 20th. We could check availability for Mr. Buckles or Mr. Belcher that week if you prefer?

I've confirmed Mr. Hamilton on the 22nd.

I can also confirm that the documents produced last night were those recovered from the source code files, and that production is complete.

I will investigate the remaining issues and get back to you.

Elise Edlin | Perkins Coie LLP

COUNSEL

She/her/hers

505 Howard Street Suite 1000
San Francisco, CA 94105
D. +1.415.344.7191
F. +1.415.344.7391
E. EEdlin@perkinscoie.com

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Read our Commitment to Racial Equality: www.perkinscoie.com/racialequality

From: Ryan Caughey <rcaughey@susmangodfrey.com>

Sent: Wednesday, September 7, 2022 3:00 PM

To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Nolan, Doug (PAO)

<DNolan@perkinscoie.com>; Amber Magee

<AMagee@susmangodfrey.com>; Bryce T. Barcelo

<BBarcelo@susmangodfrey.com>; Max Tribble

<MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller

<VKeller@susmangodfrey.com>; Kalpana Srinivasan

<ksrinivasan@SusmanGodfrey.com>; Stacy Schulze

<SSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Elise et al – Thank you for getting on the call on Friday about the 30b6 notice and depo logistics, etc. Here's where we are:

30(b)(6) Topics/Depos of Cisco

1. We discussed at length the 30(b)(6) topics we served on Cisco. We discussed your objections, and I agreed to clarify certain of the topics for which you refused to provide a witness. While we don't agree with your objections, our goal is to resolve any disputes so we can proceed promptly with depositions and complete discovery. Additionally, as noted in the attached, you indicated that you would be providing a witness for at least some of those topics. Please see attached for our clarifications to certain topics. Please confirm that, with the clarified topic, you will be presenting a witness on the topics identified in the attached document.
2. Additionally, you told us that the witnesses you had already identified would be testifying on various 30(b)(6) topics. You have now identified the topics for Friday's deposition. With respect to future depositions, we ask that you identify topics ASAP. Your failure to tell us which topics will be covered at upcoming depositions is prejudicing our ability to prepare for them.

Deposition Scheduling

1. Mr. Katz is confirmed for his remote depo on 9/14 and 9/15. Per our discussion, I propose proceeding with Mr. Katz's 30(b)(6) deposition, and if there are questions outside the scope, we can make a scope objection for the record but will allow Mr. Katz to testify in his personal capacity, subject of course to privilege objections and other appropriate objections.
2. You confirmed that Mr. Hamilton could proceed on 9/22 and Mr. Buckles on 9/23. Let's calendar those.
3. We could take 5 Corners on 9/26 or 9/27 if that helps with the schedule.
4. We understand that Messrs. Belcher and/or Buckles will cover the source code issues and the majority of the tech at issue, accused functionalities, etc. We also asked that we calendar depositions for Messrs. Zhang and Wang, who are the source code owners. Those depositions can be scheduled for after Messrs. Belcher and Buckles and the understanding is they may not need to proceed.

Other Issues / Documents

1. When we met and conferred about narrowing of claim terms and invalidity references, I proposed an approach where Cisco would narrow its references to a number of unique combinations/theories to an amount commensurate with the number of claims asserted, and Paltalk would consider a modest narrowing of the 10 claims asserted. It's now our understanding that you agree with that approach, but you've asked us to identify proposed claims to drop before you narrow your references. We're considering that request and will get back to you shortly on it.
2. We raised the issue that a large volume of presentations, memos, etc. were included with the source code but not produced in the ordinary course of discovery. On our call, you acknowledged that this was the case and said you were working on producing these materials as soon as possible. It's my understanding that those materials were produced yesterday. Please confirm they've now been produced in full.

Further, we received a large production of documents last night. We are trying to review them quickly, but the late production prejudices our ability to prepare for Friday's deposition. At this point, we anticipate proceeding with Friday's deposition, but we will let you know if we encounter insurmountable issues.

Please let us know your response as soon as possible or tell us times early next week when you're available to meet and confer. Thanks.

Ryan

Ryan Caughey | Susman Godfrey LLP

713.653.7823 | c. 202.714.2302

1000 Louisiana St. | Suite 5100 | Houston, Texas 77002

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rcaughey@susmangodfrey.com | [Ryan Caughey Bio](#)

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From: Ryan Caughey

Sent: Friday, September 2, 2022 10:52 AM

To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Nolan, Doug (PAO)

<DNolan@perkinscoie.com>; Amber Magee

<amagee@susmangodfrey.com>; Bryce T. Barcelo

<BBarcelo@susmangodfrey.com>; Max Tribble

<MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller

<vkeller@susmangodfrey.com>; Kalpana Srinivasan

<ksrinivasan@SusmanGodfrey.com>; Stacy Schulze

<SSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Great. We both sent invites. I'm happy to use yours, but I don't care either way.

Ryan Caughey | Susman Godfrey LLP

713.653.7823 | c. 202.714.2302

1000 Louisiana St. | Suite 5100 | Houston, Texas 77002

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rcaughey@susmangodfrey.com | [Ryan Caughey Bio](#)

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From: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>

Sent: Friday, September 2, 2022 10:49 AM

To: Ryan Caughey <rcaughey@susmangodfrey.com>; Nolan, Doug (PAO)

<DNolan@perkinscoie.com>; Amber Magee

<AMagee@susmangodfrey.com>; Bryce T. Barcelo

<BBarcelo@susmangodfrey.com>; Max Tribble

<MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller

<VKeller@susmangodfrey.com>; Kalpana Srinivasan

<ksrinivasan@SusmanGodfrey.com>; Stacy Schulze
<SSCHULZE@SusmanGodfrey.com>
Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

EXTERNAL Email

Ryan,

10:30 is fine.

Thank you,

Elise Edlin | Perkins Coie LLP

COUNSEL

She/her/hers

505 Howard Street Suite 1000
San Francisco, CA 94105
D. +1.415.344.7191
F. +1.415.344.7391
E. EEdlin@perkinscoie.com

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From: Ryan Caughey <rcaughey@susmangodfrey.com>

Sent: Friday, September 2, 2022 6:34 AM

To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Nolan, Doug (PAO)

<DNolan@perkinscoie.com>; Amber Magee

<AMagee@susmangodfrey.com>; Bryce T. Barcelo

<BBarcelo@susmangodfrey.com>; Max Tribble

<MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller

<VKeller@susmangodfrey.com>; Kalpana Srinivasan

<ksrinivasan@SusmanGodfrey.com>; Stacy Schulze

<SSCHULZE@SusmanGodfrey.com>

Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Elise – A conflict has come up and I can no longer talk at 10am PDT. Could you do 10:30?

Ryan Caughey | Susman Godfrey LLP

713.653.7823 | c. 202.714.2302

1000 Louisiana St. | Suite 5100 | Houston, Texas 77002

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rcaughey@susmangodfrey.com | [Ryan Caughey Bio](#)

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From: Ryan Caughey
Sent: Thursday, September 1, 2022 1:31 PM
To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <amagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <vkeller@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>
Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Yes, I can talk at 10am PDT tomorrow. I'll send an invite.

We can take Pearce on 9/9 and will take him remotely. We can also take Belcher on the 21st, also likely remotely. We'll send notices.

For the other two, I do not understand why you proposed dates after the close of fact discovery. Please propose dates within the discovery period. Please also propose date(s) for the 30(b)(6) deposition. We want to take the witnesses proposed as 30(b)(1) depositions, and we are also of course entitled to a 30(b)(6) deposition. If those witnesses will also be 30(b)(6) deponents, we reserve the right to seek more than one day of testimony. Additionally, we need to know immediately if Mr. Pearce will testify on any 30(b)(6) topics.

With respect to Mr. Katz, we are okay proceeding with his 30(b)(6), followed by 30(b)(1) testimony as needed. We will be sending our 30(b)(6) objections by the end of this week. One additional note on Mr. Katz: there is a chance we will have a conflict on 9/14 and 9/15; we are hoping we will not but won't know for sure until tomorrow. Would you be available to take his deposition on 9/20 and, as needed, 9/21 instead if it becomes necessary?

We can discuss these issues tomorrow.

Best,
Ryan

1000 Louisiana St. | Suite 5100 | Houston, Texas 77002
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rcaughey@susmangodfrey.com | [Ryan Caughey Bio](#)

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From: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>
Sent: Thursday, September 1, 2022 1:01 PM
To: Ryan Caughey <rcaughey@susmangodfrey.com>; Nolan, Doug (PAO) <DNolan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <krsrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>
Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

EXTERNAL Email

Hi Ryan,

I'm available tomorrow morning at 10 am PDT. Please let me know if that works, otherwise we can discuss on Tuesday.

Are you able to confirm any of the dates that we provided already (especially Pearce next Friday)? Once those are solidified it will be easier to schedule anything additional that is needed, and if those need to reshuffle then the sooner the better in order to find additional availability during the month of September.

Thank you,

Elise Edlin | Perkins Coie LLP
COUNSEL
She/her/hers

505 Howard Street Suite 1000
San Francisco, CA 94105
D. +1.415.344.7191
F. +1.415.344.7391
E. EEdlin@perkinscoie.com

Visit our COVID-19 page: www.perkinscoie.com/coronavirus

Read our Commitment to Racial Equality: www.perkinscoie.com/racialequality

From: Ryan Caughey <rcaughey@susmangodfrey.com>

Sent: Thursday, September 1, 2022 7:26 AM
To: Nolan, Doug (PAO) <DNLan@perkinscoie.com>; Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Kalpana Srinivasan <krsrinivasan@SusmanGodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>
Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: RE: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

Counsel – Please let us know when you are available to meet and confer about these objections. We could chat tomorrow or early next week. Please also let us know dates when your 30(b)(6) witnesses are available to be presented. Thanks

Ryan Caughey | Susman Godfrey LLP
713.653.7823 | c. 202.714.2302
1000 Louisiana St. | Suite 5100 | Houston, Texas 77002
HOUSTON • NEW YORK • LOS ANGELES • SEATTLE
rcaughey@susmangodfrey.com | [Ryan Caughey Bio](#)

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From: Nolan, Doug (PAO) <DNLan@perkinscoie.com>
Sent: Monday, August 29, 2022 4:36 PM
To: Amber Magee <AMagee@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Ryan Caughey <rcaughey@susmangodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>
Cc: *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: Paltalk v. Cisco (W.D. Tex. Case No. 6:21-CV-00757) -- Cisco's R&Os to Paltalk's 30(b)(6) Depo. Notice re Depo. Topics

EXTERNAL Email

Counsel,

Please find attached for service the following document sent in connection with the above-referenced matter:

1. CISCO SYSTEM, INC.'S RESPONSES AND OBJECTIONS TO PALTALK HOLDINGS, INC.'S NOTICE OF RULE 30(B)6 DEPOSITION OF CISCO SYSTEMS, INC.: DEPOSITION TOPICS

Best regards,

Doug Nolan | Perkins Coie LLP

SENIOR PARALEGAL

3150 Porter Drive

Palo Alto, CA 94304-1212

D: +1.650.838.4721

E: DNLolan@perkinscoie.com

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